

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Midland Funding, LLC,	)	CASE NO.: 3:08-cv-01434
	)	
Plaintiff/Counterclaim Defendant	)	HON. DAVID A. KATZ
	)	
vs.	)	
	)	<b><u>And Related Cases:</u></b>
Andrea Brent,	)	
	)	Case No. 3:11-cv-0096, N.D. Ohio
Defendant/Counterclaim Plaintiff	)	Case No. 3:10-cv-0091, N.D. Ohio
	)	
vs.	)	<b>MIDLAND’S JOINDER IN BRENT’S</b>
	)	<b>MOTION TO STAY PROPOSED</b>
Midland Credit Management, Inc.,	)	<b>INTERVENOR’S MOTION TO</b>
	)	<b>MODIFY, AMEND, OR CLARIFY</b>
Counterclaim Defendant.	)	<b>INJUNCTION</b>
	)	

Midland Funding LLC and Midland Credit Management Inc. (collectively “Midland”) hereby join in Andrea Brent’s Motion to Stay Proposed Intervenor’s Motion to Modify, Amend, or Clarify Injunction [Dkt. 140], and all arguments set forth therein.

Midland agrees with Brent that all briefing on Proposed Intervenor Ladon Herring’s Motion to Modify, Amend, or Clarify should be stayed pending the outcome of Herring’s Motion to Intervene and pending this Court’s ruling on the Motion for Relief from Preliminary Injunction filed by Herring’s counsel. However, Midland has filed an opposition to the Motion out of an abundance of caution. Midland reserves the right to supplement its opposition, if necessary, in the event that the Motion to Stay is granted.

Date: April 14, 2011

Respectfully Submitted:

/s/ Theodore W. Seitz

Theodore W. Seitz

Dykema Gossett PLLC

Counsel for Midland Funding, LLC and  
Midland Credit Management, Inc.

Capitol View

201 Townsend Street, Suite 900

Lansing, MI 48933

Tele: (517) 374-9149

tseitz@dykema.com

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2011, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to counsel of record. I hereby certify that I have mailed by United States Postal Service the same to any non-ECF participants.

/s/ Theodore W. Seitz

Theodore W. Seitz